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April 20, 1998

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VIA HAND DELIVERY

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary, Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

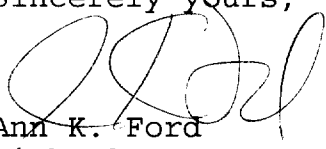
Re: Petition for Rule Making
Amendment of Section 73.622(b)
Digital Television Table of Allotments
Kingston, New York

Dear Ms. Salas:

WRNN-TV Associates Limited Partnership, licensee of Station WRNN-TV, NTSC Channel 62/DTV Channel 21, Kingston, New York, files an original and four copies of a Petition for Rule Making to amend the DTV Table of Allotments by substituting DTV Channel 48 for DTV Channel 21 at Kingston. The attached Technical Narrative is a copy; the original will be filed upon receipt.

Please contact the undersigned if you have any questions.

Sincerely yours,


Ann K. Ford
Michael Ruger

Enclosures

cc: Bruce A. Franca, Office of Engineering and Technology,
Room 416, 2000 M Street, N.W.
Alan Stilwell, Office of Engineering and Technology,
Room 417, 2000 M Street, N.W.
Gordon Godfrey, Mass Media Bureau,
Room 566, 2000 M Street, N.W.
John Karousos, Mass Media Bureau,
Room 554, 2000 M Street, N.W.

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APR 20 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

In the Matter of)
)
Amendment of Section 73.622(b),) MM Docket No. 98-____
Digital Television Table of) RM-____
Allotments)
(Kingston, New York))

To: The Commission

PETITION FOR RULE MAKING

1. WRNN-TV Associates Limited Partnership ("WRNN"), licensee of Station WRNN-TV, Kingston, New York, through counsel, hereby requests the modification of its initial digital television (DTV) allotment from DTV Channel 21 to DTV Channel 48 and the modification of the reference coordinates for its DTV channel pursuant to Section 73.623(c) of the Commission's Rules, 47 C.F.R. § 73.623(c).¹ Grant of this proposal would serve the public interest by eliminating significant interference to a noncommercial television station, reducing the unique interference caused by Station WRNN-TV's DTV operation and reducing the overall percentage of interference received by Station WRNN-TV's DTV operation, while greatly increasing the over-the-air accessibility of the station throughout the New York Area of Dominant Influence ("ADI"). As WRNN intends to commence operations on its DTV channel as soon as possible, expedited action on this petition is requested.

¹WRNN files this request as a petition for rule making upon the advice of the Commission's staff. WRNN reserves the right to supplement this request with additional information.

2. Specifically, as the attached Technical Narrative demonstrates, the use of DTV Channel 21 would cause interference to 863,010 persons, including 63,197 persons who would receive unique interference, whereas the use of DTV Channel 48 with directionalized facilities would ultimately cause interference to only approximately 95,000 persons, with only approximately 26,000 persons receiving unique interference. Unique interference to 58,545 persons within the service area of noncommercial Station WLIW, Garden City, New York, would be eliminated. At the same time, the total service area for Station WRNN-TV would increase from 1,456,000 persons to 10,593,146 persons, while the percentage of persons within the Station WRNN-TV service area receiving interference would decrease from 20.3% for DTV Channel 21 to 8.1% for DTV Channel 48.

Background

3. Station WRNN-TV, which currently operates on NTSC Channel 62, is an independent station providing regional news programming to its community of license and to communities throughout the New York ADI. Unlike the vast majority of television stations, Station WRNN-TV will not have the option of returning to its NTSC channel following the DTV transition period, as the station operates outside of the core spectrum. WRNN intends to commence operations on its DTV channel as soon as possible so as to remain competitive with other television stations in the New York ADI.

4. The Commission allotted DTV Channel 21 for Station WRNN-TV in Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service (Sixth Report and Order), 12 FCC Rcd 14588 (1997). WRNN filed a petition for reconsideration of that allotment, requesting the allotment of DTV Channel 48 in lieu of DTV Channel 21. WRNN explained in its petition for reconsideration that the allotment of DTV Channel 48 to Kingston would result in a dramatic reduction of net interference as compared to DTV Channel 21.²

5. The Commission denied WRNN's petition for reconsideration in its Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service (Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order) (FCC 98-24, released February 23, 1998) ("Sixth Report Reconsideration"). Specifically, the Commission stated:

We have reviewed WRNN's request, and our analysis indicates that operation of WRNN-TV's DTV service on channel 48 would cause additional interference to other stations. . . . We therefore are denying WRNN's request that its DTV allotment be changed to channel 48. To the extent that WRNN desires a further improvement in its DTV facilities, we have indicated that such requests are to be addressed under our rules and regulations for maximization of DTV facilities.

Sixth Report Reconsideration at ¶ 401.

6. WRNN has extensively analyzed the impact that DTV operation on Channel 21 would have not only on its facilities but on other stations as well. As the Technical Narrative

²WRNN Petition for Reconsideration in MM Docket No. 87-268, filed June 13, 1997, at 3-4.

demonstrates, DTV Channel 21 would cause interference to 863,010 persons. Furthermore, DTV Channel 21 would be the unique cause of interference to 63,197 persons; in other words, but for the operation of DTV Channel 21, those persons would receive no interference from DTV channels. Technical Narrative at 2. Importantly, most of the interference caused by DTV Channel 21 would be received by noncommercial Station WLIW, NTSC Channel 21, Garden City, New York. That station would receive interference to 848,889 persons from DTV Channel 21, with 58,545 persons receiving unique interference. Technical Narrative at 2.

7. Station WRNN-TV would also receive substantial interference. The attached Technical Narrative demonstrates that Station WRNN-TV would receive interference to 20.3% of the total population within its Grade B contour, or 432,191 persons. Technical Narrative at 3. Noncommercial Station WLIW would cause interference to 393,505 persons within Station WRNN-TV's Grade B contour. Technical Narrative at 3.

8. The creation of interference to over 20% of the total population within Station WRNN-TV's Grade B contour would deprive hundreds of thousands of viewers of the ability to view that station's unique regional news programming and would have a massive economic impact upon the station. Furthermore, the creation of unique interference to over 58,000 potential viewers of Station WLIW would obviously affect that station as well. Such results are not in the public interest.

Discussion

9. WRNN has determined that DTV Channel 48 is available for use by Station WRNN-TV at reference coordinates 67.5 kilometers (42.0 miles) south of the station's current site.³ DTV Channel 48 would cause interference to 209,111 persons, with 65,030 receiving unique interference. Technical Narrative at 4. The allotment of DTV Channel 48 would not result in more than an additional 2 percent of the population served by another station being subject to interference, and, with two exceptions described below, no new interference would be caused to any station that already experiences interference to 10 percent or more of its population.⁴ Interference to noncommercial Station WLIW would be totally eliminated.⁵ That station would otherwise receive interference to 848,889 persons from DTV Channel 21, with 58,545 persons receiving unique interference.

10. The Technical Narrative indicates that 72,588 persons that would receive interference (of which 32,680 persons would

³Proposed site coordinates are 41-29-19 North Latitude and 73-56-52 West Longitude. The use of DTV Channel 48 will comply with the principal community coverage requirements of Section 73.625(a) of the Commission's Rules, 47 C.F.R. § 73.625(a). See Technical Narrative at 4.

⁴See Section 73.623(c)(2) of the Commission's Rules, 47 C.F.R. § 73.623(c)(2).

⁵The Technical Narrative indicates that Station WRNN-TV would cause interference to noncommercial Station WNJN, NTSC Channel 50, Montclair, New Jersey, and to noncommercial Station WEDW, NTSC Channel 49, Bridgeport, Connecticut. Technical Narrative at 4. The interference to Station WNJN is significantly less than the interference that would be received solely by Station WLIW from DTV Channel 21. The interference to Station WEDW is discussed below.

receive unique interference) are in the projected service area of unbuilt Station WYDN, NTSC Channel 48, Worcester, Massachusetts. That station is predicted to receive interference to 13.9 percent of the population within its existing NTSC service area. Technical Narrative at 4. It is questionable whether Station WYDN will ever be on the air, however. The construction permit for Station WYDN was originally granted in 1988 (FCC File No. BPET-860725KN) and subsequently modified in 1992 (FCC File No. BMPET-920220KF). The Commission's database indicates that the permit expired on January 29, 1993. Since that date, subsequent modification applications (FCC File Nos. BMPET-930914KL, BMPET-950407KQ and BMPET-951016KE) as well as an application to replace the expired construction permit (FCC File No. BPET-970721KF) have been filed. The Commission's database does not indicate that any of these applications have been granted.

11. In any event, preliminary studies indicate that the use of a directional antenna by Station WRNN-TV would permit reduction of any interference to *de minimis* levels. Technical Narrative at 4. WRNN would be willing to directionalize its signal as a condition of operating on DTV Channel 48 if and when Station WYDN is on the air.

12. DTV Channel 48 would also cause interference to noncommercial Station WEDW, NTSC Channel 49, Bridgeport, Connecticut. Specifically, 41,068 persons would receive interference, of which 7,040 would receive unique interference. Station WEDW currently is predicted to receive interference to

10.2 percent of the population within its existing NTSC service area. Technical Narrative at 4. Again, preliminary studies indicate that the use of a directional antenna by Station WRNN-TV would permit reduction of any interference to *de minimis* levels. Technical Narrative at 4.

13. Should Station WRNN-TV directionalize to avoid interference to Stations WYDN and WEDW, the net unique interference caused by DTV Channel 48 would total approximately 26,000 persons, which is 41.1% of the unique interference caused by DTV Channel 21. The overall interference would fall to approximately 95,000, which is approximately 11% of the interference caused by DTV Channel 21.

14. Use of DTV Channel 48 at the requested site would also allow Station WRNN-TV to better serve its community of license, the population within the Hudson Valley and the New York ADI by avoiding line of sight problems associated with the current site. The total population within Station WRNN-TV's predicted service contour would increase from 1,456,000 persons to 10,593,146 persons. Technical Narrative at 2-3. While the total population within Station WRNN-TV's service contour would increase, the percentage of persons receiving interference would decrease, from 20.3% for DTV Channel 21 to 8.1% for DTV Channel 48. Technical Narrative at 4.⁶ As a result, people throughout the New York ADI

⁶Furthermore, much of that interference would be caused by unbuilt Station WYDN and is of no concern to WRNN.

would be able to view Station WRNN-TV's unique over-the-air local news programming.

Conclusion

15. Accordingly, for the reasons stated above, WRNN respectfully requests that the Digital Television Table of Allotments, Section 73.622(b) of the Commission's Rules, be amended as follows:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Kingston, New York	21	48

Substitution of DTV Channel 48 for DTV Channel 21 at the alternate site proposed by WRNN and described in the Technical Narrative would eliminate significant interference caused by and to Station WRNN-TV and would provide over 8,861,000 viewers with an additional over-the-air service. WRNN will file an application for DTV operation at the site proposed for DTV Channel 48 promptly upon grant of this request.

Respectfully submitted,



Ann K. Ford
Michael Ruger

Counsel for WRNN-TV Associates
Limited Partnership

Baker & Hostetler LLP
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Suite 1100
Washington, DC 20036-5304

Telephone (202) 861-1500

Filed: April 20, 1998

TECHNICAL EXHIBIT
PREPARED ON BEHALF OF
WRNN-TV ASSOCIATES LIMITED PARTNERSHIP
IN SUPPORT OF A PROPOSAL
TO MODIFY THE DTV ALLOTMENT OF WRNN

Technical Narrative

This technical narrative and associated exhibits have been prepared on behalf of WRNN-TV Associates Limited Partnership ("WRNN") in support of its proposal to modify the DTV allotment of WRNN.

WRNN is the licensee of full-power TV station WRNN at Kingston, New York (BLCT-851224KF). Station WRNN currently operates on UHF TV channel 62 (758-764 MHz) with a directional antenna maximum ERP of 5000 kW (37 dBk) and an antenna height above average terrain (HAAT) of 591 meters. In the Memorandum, Opinion and Order (MO&O) concerning reconsideration and clarification of the 6th Report and Order (6th R&O) in MM Docket No. 87-268, which concerns implementation of digital television (DTV), station WRNN was allotted channel 21 for its DTV allotment with an ERP of 98 kW and an antenna HAAT of 591 meters. It is proposed to modify WRNN's DTV allotment to propose channel 48 (674-680 MHz) in lieu of channel 21. It is also proposed to relocate the transmitter site of WRNN from its current location to a location on Beacon Mountain. In support of this, it is demonstrated that channel 48 appears to be available as an alternate DTV channel in the Kingston area for WRNN.

WRNN DTV Operation - Current Site

The FCC authorized channel 21 for WRNN's DTV operation with a directional antenna maximum ERP of 98 kW and an HAAT of 591 meters. The FCC estimates the current

NTSC operation provides service to 1,456,000 persons within 15,913 square kilometers, and the proposed DTV operation will provide interference-free service to 1,732,000 persons within 18,233 square kilometers. A DTV/NTSC area match of 99 percent is also indicated. These facilities would essentially replicate the DTV coverage authorized for channel 21. Figure 1 contains a separation study for DTV channel 21.

Interference studies were conducted for a DTV operation on channel 21 using the procedures outlined in the FCC's 6th R&O, the recent MO&O, and OET-69 bulletin. This includes use of the Longley-Rice propagation model and a 3 second digitized terrain database. This is basically the program used by the FCC to calculate service and interference in developing the DTV allotment table. The studies considered interference "caused" and "received". The results are tabulated below.

WRNN DTV Channel 21 (FCC) - Interference Caused				
Station Interfered With	Interference Area			
	FCC Service Population	Total Interference Population	Unique Interference Population	Unique Interference - % of Total Pop. Within Service Area
WHMT, NTSC-17, Schenectady, NY	1,155,000	91	91	0.01
WTXX, NTSC-20, Waterbury, CT	4,039,000	12,150	4,108	0.11
WLIW, NTSC-21, Garden City, NY	11,134,000	848,889	58,545	0.53
DWSBE, DTV-21, Providence, RI	2,351,000	47	0	0
WNBU, NTSC-21, Concord, NH	1,880,000	988	219	0.01
WWLP, NTSC-22, Springfield, MA	2,079,000	730	210	0.01
WXXA, NTSC-23, Albany, NY	1,162,000	115	24	0.002
Total		863,010	63,197	--

WRNN DTV Channel 21 (FCC) - Interference Received		
Station Causing Interference	Interference Area	
	Unmasked 1990 Census Population	% of Total Population Within Grade B/Noise Limited Contour
WTXX, NTSC-20, Waterbury, CT	87,806	5.1
WLIW, NTSC-21, Garden City, NY	393,505	18.45
DWSBE, DTV-21, Providence, RI	26,686	1.25
WNBU, NTSC-21, Concord, NH	16,289	0.76
WHP-TV, NTSC-21, Harrisburg, PA	5,119	0.24
WWLP, NTSC-22, Springfield, MA	1,669	0.08
DWLIW, NTSC-22, Garden City, NY	756	0.04
Total (duplicated areas considered)	531,830	--
Total (duplicated areas not considered)	432,191	20.3

WRNN Proposed Ch. 48 DTV Operation - Beacon Mountain Site

A hypothetical channel 48 DTV operation was presumed from the Beacon Mountain site located 67.5 km (42.0 miles) south of the current site. FM station WSPK on channel 284B (104.7 MHz) at Poughkeepsie, NY currently operates from this location with an antenna radiation center height above mean sea level (RCAMSL) of 504 meters and an antenna radiation center height above average terrain of (HAAT) of 381 meters (1250 feet). Therefore, a nondirectional ERP of 200 kW and an HAAT of 381 meters was used for the proposed channel 48 operation from Beacon Mountain. The noise-limited contour (39.2 dBu) would contain a population of 10,593,146 persons. Figure 1 contains a separation study for DTV channel 48. The results of the interference studies are summarized below.

WRNN DTV Channel 48 Beacon Mountain Site (Proposed) - Interference Caused				
Station Interfered With	Interference Area			
	FCC Service Population	Total Interference Population	Unique Interference Population	Unique Interference - % of Total Pop. Within Service Area
WXTV, NTSC-41, Paterson, NJ	16,233,000	134	134	0.0008
WNJU, NTSC-47, Linden, NJ	16,110,000	15,244	14,051	0.09
DWYDN, DTV-47, Worcester, MA	3,870,000	75	75	0.002
WYDN, NTSC-48, Worcester, MA	3,643,000	72,588	32,680	0.90**
WEDW, NTSC-49, Bridgeport, CT	3,156,000	41,068	7,040	0.22**
WGTW, NTSC-48, Burlington, NJ	6,439,000	73,117	5,378	0.08
WNJN, NTSC-50, Montclair, NJ	15,296,000	6,885	5,672	0.04
Total	--	209,111	65,030	--

**Note: The FCC's DTV allotment table indicates that WYDN will receive new interference to 13.9 percent of the population within its existing NTSC service area and WEDW will receive interference to 10.2 percent of the population within its existing NTSC service area. Under the DTV maximization criteria, no new interference can be caused to any station currently receiving interference to 10 percent of its existing service area. Preliminary studies indicate that use of a directional antenna would permit reduction of the interference to "de minimus" levels in the direction of WYDN (63° true) and WEDW (110° True).

WRNN DTV Channel 48 Beacon Mountain Site (Proposed) - Interference Received		
Station Causing Interference	Interference Area	
	Unmasked 1990 Census Population	% of Total Population Within Grade B/Noise Limited Contour
WNJU, NTSC-47, Linden, NJ	391,094	3.7
WGTW, NTSC-48, Burlington, NJ	270,017	2.6
WYDN, NTSC-48, Worcester, MA	461,714	4.4
WEDW, NTSC-49, Bridgeport, CT	107,819	1.0
Total (duplicated areas considered)	1,230,644	--
Total (duplicated areas not considered)	856,303	8.1

DTV operation from the Beacon Mountain site will comply with the city coverage provisions of Section 73.625(a).

Summary

In summary, WRNN requests that the FCC consider modification of WRNN's DTV allotment to specify channel 48 and also permit relocation of the transmitter site of WRNN from its current location to a location on Beacon Mountain.

W. Jeffrey Reynolds

W. Jeffrey Reynolds

du Treil, Lundin & Rackley, Inc.
240 North Washington Blvd.
Suite 700
Sarasota, Florida 34236

April 13, 1998

DTV -> TV Separation Study

Job Title : **WRNN DTV Ch. 21 - Current Site** Separation Buffer 50 km
Zone : 1 FCC TV DB Date : 03/27/98
Channel 21 (512-518 MHz) Coordinates : 42-05-06 74-06-00

Call Status	City St	FCC File No.	Channel Zone	ERP(kW) HAAT(m)	Latitude Longitude	Bear. True	Dist. (km)	Req. (km)
LMRS	NJ	-	NEW YORK/NORTHEAST 14(o)	0	40-45-06 73-59-39	176.6	148.35 0.00	0.0 LMRS
LAND MOBILE CHANNEL ONLY								
WMHT LIC	SCHENECTADY NY	BLET-331	*17(+) I	2630 299	42-38-13 74-00-06	7.5	61.85 -18.65	24.1/80.5 SHORT
ALLOCATED TO ALBANY-SCHENECTADY, NY.								
WHCTTV LIC	HARTFORD CT	BLCT-870304KI	18(-) I	3160 299	41-46-30 72-48-04	107.4	113.11 32.61	24.1/80.5 CLEAR
NEW APP	HARTFORD CT	BPCT-831202KF	18(-) I	5000 189	41-45-39 72-48-08	108.1	113.53 33.03	24.1/80.5 CLEAR
MX WITH RENEWAL OF WHCT-TV CH 18, HARTFORD, CT.								
NEW APP	HARTFORD CT	BPCT-890301KK	18(-) I	158 189	41-45-39 72-48-08	108.1	113.53 33.03	24.1/80.5 CLEAR
MX WITH RENEWAL OF WHCT-TV, CH 18 HARTFORD, CT.								
WCDCTV LIC	ADAMS MA	BLCT-810105KE	19(o) I	447 637	42-38-14 73-10-07	50.9	98.25 17.75	24.1/80.5 CLEAR
LMRS	NY	-	NEW YORK 19(o)	0	40-45-06 73-59-39	176.6	148.35 0.00	0.0 LMRS
PROPOSED LAND MOBILE CHANNEL, DOCKET 85-172								
WTVX LIC	WATERBURY CT	BLCT-820428KE	20(o) I	2240 366	41-31-04 73-01-07	124.8	109.77 3.77	12.0/106.0 CLOSE
WUTR LIC	UTICA NY	BLCT-1970	20(+) I	912 244	43-08-43 75-10-35	323.6	147.22 41.22	12.0/106.0 CLEAR
WUTR CP	UTICA NY	BPCT-790426KG	20(+) I	1150 244	43-08-43 75-10-35	323.6	147.22 41.22	12.0/106.0 CLEAR
WLIW LIC	GARDEN CITY NY	BLET-790131LQ	*21(-) I	3160 DA 122	40-47-19 73-27-09	159.3	153.82 -63.48	217.3 SHORT
WNBU CP	CONCORD NH	BPCT-950215KF	21(+) I	1860 320	43-11-04 71-19-12	60.8	258.69 41.39	217.3 CLEAR
WNBU LIC	CONCORD NH	BLCT-840425KF	21(+) I	1860 344	43-11-04 71-19-12	60.8	258.69 41.39	217.3 CLEAR
WWLP LIC	SPRINGFIELD MA	BLCT-841128KJ	22(o) I	3390 DA 268	42-05-05 72-42-14	89.5	115.53 9.53	12.0/106.0 CLOSE

Call Status	City St	FCC File No.	Channel Zone	ERP(kW) HAAT(m)	Latitude Longitude	Bear. True	Dist. (km)	Req. (km)
WWLP	SPRINGFIELD		22(o)	4470 DA	42-05-05	89.5	115.53	12.0/106.0
APP	MA	BMPCT-930826KE	I	267	72-42-14		9.53	CLOSE
DA TABULATIONS UNAVAILABLE.								
WXXATV	ALBANY		23(-)	3020 DA	42-37-01	6.9	59.53	24.1/80.5
LIC	NY	BLCT-820810KG	I	366	74-00-46		-20.97	SHORT
ALLOCATED TO ALBANY-SCHENECTADY, NY.								
WEDH	HARTFORD		*24(o)	813	41-46-27	107.5	112.79	24.1/80.5
LIC	CT	BLET-341	I	262	72-48-20		32.29	CLEAR
WNYETV	NEW YORK		*25(o)	2450 DA	40-44-54	176.3	148.77	24.1/80.5
LIC	NY	BLET-920220KG	I	395	73-59-10		68.27	CLEAR
	NEW YORK		28(o)		40-45-06	176.6	148.35	0.0
LMRS	NY	-		0	73-59-39		0.00	LMRS
PROPOSED LAND MOBILE CHANNEL, DOCKET 85-172								
NEW	SCHENECTADY		*29(+)	617.	42-47-08	26.2	86.95	24.1/80.5
APP	NY	BPET-960724KU	I	229	73-37-44		6.45	CLOSE
REQUESTS A WAIVER OF FREEZE;ALLOCATED TO ALBANY-SCHENECTADY, N								
	NORTH ADAMS		*35(o)		42-41-53	49.7	106.16	24.1/80.5
ALLOC.	MA	-	I	0	73-06-40		25.66	CLEAR

** End of TV Separation Study for Channel 21 **

DTV ->DTV Separation Study

Job Title :WRNN DTV Ch. 21 - Current Site Separation Buffer 50 km
Zone : 1 FCC DTV DB Date: 03/16/98
Channel 21 (512-518 MHz) Coordinates : 42-05-06 74-06-00

Call Status	City St	FCC File No.	Channel Zone	ERP(kW) HAAT(m)	Latitude Longitude	Bear. True	Dist. (km)	Req. (km)
DWRNNTV	KINGSTON		21	98.00	42-05-06	0.0	0.00	
DTVALT	NY		I	591.	74-06-00			
DWSBETV	PROVIDENCE		21	50.00	41-48-18	97.3	220.02	196.3
DTVALT	RI		I	182.	71-28-24		23.72	CLEAR
DWWTI	WATERTOWN		21	50.00	43-52-47	327.1	239.18	196.3
DTVALT	NY		II	387.	75-43-11		42.88	CLEAR

** End of DTV Separation Study for Channel 21 **

TV -> TV Separation Study

Job Title :WRNN Ch. 48 - Beacon Mountain Site Separation Buffer 100 km
Zone : 1 FCC TV DB Date : 04/10/98
Channel 48 (674-680 MHz) Coordinates : 41-29-19 73-56-52

Call Status	City St	FCC File No.	Channel Zone	ERP(kW) HAAT(m)	Latitude Longitude	Bear. True	Dist. (km)	Req. (km)
	NEW YORK		33(o)		40-45-06	182.7	81.94	0.0
LMRS	NY	-		0	73-59-39		0.00	LMRS
PROPOSED LAND MOBILE CHANNEL, DOCKET 85-172								
WFXV	UTICA		33(o)	42.7 DA	43-02-14	324.9	211.76	119.9
LIC	NY	BLCT-861210KG	I	197	75-26-40		91.86	CLEAR
WFXV	UTICA		33(o)	851.	43-02-14	324.9	211.76	119.9
CP	NY	BPCT-960111LM	I	193	75-26-40		91.86	CLEAR
	NEW YORK		34(o)		40-45-06	182.7	81.94	0.0
LMRS	NY	-		0	73-59-39		0.00	LMRS
PROPOSED LAND MOBILE CHANNEL, DOCKET 85-172								
WIVT	BINGHAMTON		34(o)	2820 DA	42-03-39	291.7	177.69	95.7
APP	NY	BPCT-970807KK	I	283	75-56-36		81.99	CLEAR
WIVT	BINGHAMTON		34(o)	1480	42-03-39	291.7	177.69	95.7
LIC	NY	BLCT-871110KV	I	281	75-56-36		81.99	CLEAR
WGGBTV	SPRINGFIELD		40(o)	4270 DA	42-14-30	51.7	136.47	31.4
LIC	MA	BLCT-871117KE	I	322	72-38-57		105.07	CLEAR
WXTV	PATERSON		41(-)	2340 DA	40-44-54	182.2	82.28	95.7
LIC	NJ	BLCT-920218KE	I	421	73-59-10		-13.42	SHORT
WIPX	BRIDGEPORT		43(-)	2290 DA	41-21-43	101.2	71.17	31.4
LIC	CT	BLCT-871009KE	I	156	73-06-48		39.77	CLEAR
WMHQ	SCHENECTADY		45(o)	2950 DA	42-37-37	357.7	126.56	31.4
LIC	NY	BLCT-850114KJ	I	338	74-00-40		95.16	CLEAR
ALLOCATED TO ALBANY-SCHENECTADY, NY.								
	ALBANY-SCHENECTADY		45(o)		42-39-01	7.1	130.07	31.4
ALLOC.	NY	-	I	0	73-45-01		98.67	CLEAR
ALLOCATION USED SCHENECTADY, NY.								
WNJU	LINDEN		47(+)	4570 DA	40-42-43	183.7	86.44	87.7
LIC	NJ	BLCT-800423KE	I	460	74-00-49		-1.26	SHORT

Call Status	City St	FCC File No.	Channel Zone	ERP(kW) HAAT(m)	Latitude Longitude	Bear. True	Dist. (km)	Req. (km)
WYDN CP MOD	WORCESTER MA	BMPET-920220KF	*48(+) I	5000 250	42-08-32 72-13-28	62.5	160.56 -88.04	248.6 SHORT
WYDN APP	WORCESTER MA	BMPET-930914KL	*48(+) I	2000 DA 192	42-08-32 72-13-28	62.5	160.56 -88.04	248.6 SHORT
WGTW APP	BURLINGTON NJ	BPCT-950706KF	48(-) I	5000 364	40-02-49 75-14-08	214.5	193.54 -55.06	248.6 SHORT
WGTW CP	BURLINGTON NJ	BPCT-840104KL	48(-) I	2340 335	40-02-36 75-14-33	214.6	194.20 -54.40	248.6 SHORT
WYDC LIC	CORNING NY	BLCT-940920KE	48(+) I	12 DA 166	42-09-43 77-02-15	287.3	267.37 18.77	248.6 CLEAR
WEDW LIC	BRIDGEPORT CT	BLET-870908KE	*49(-) I	1950 DA 222	41-16-43 73-11-08	109.9	67.90 -19.80	87.7 SHORT
WNJN LIC	MONTCLAIR NJ	BLET-860805KG	*50(+) I	2090 243	40-51-53 74-12-03	197.1	72.48 41.08	31.4 CLEAR
WNJN CP	MONTCLAIR NJ	BPET-891219KE	*50(+) I	5000 243	40-51-53 74-12-03	197.1	72.48 41.08	31.4 CLEAR
ALLOC.	PITTSFIELD MA	-	51(+) I	0	42-26-48 73-15-12	28.1	121.00 89.60	31.4 CLEAR
NEW APP	PITTSFIELD MA	BPCT-960724LI	51(+) I	5000 345	42-32-42 73-17-09	24.7	129.52 98.12	31.4 CLEAR
REQUESTS A WAIVER OF FREEZE								
WNJT1 CP	CLINTON NJ	BPUB-880614ND	52(o) I	0.6 0	40-41-43 74-55-13	223.1	120.17 88.77	31.4 CLEAR
WLNY LIC	RIVERHEAD NY	BLCT-850429KJ	55(+) I	5000 DA 194	40-53-50 72-54-56	126.9	108.69 12.99	95.7 CLOSE
WYPX LIC	AMSTERDAM NY	BLCT-871221KG	55(o) I	5000 DA 223	42-59-05 74-10-49	353.5	167.30 71.60	95.7 CLEAR
WCBS-DT CP	NEW YORK NY	BPCDT-971103KE	56 I	349 397	40-44-54 73-59-10	182.2	82.28 50.88	31.4 CLEAR
ERP AS SHOWN ON CP.								
WRNNTV LIC	KINGSTON NY	BLCT-851224KF	62(+) I	5000 DA 591	42-05-06 74-06-00	349.3	67.45 -28.25	95.7 SHORT
WMBCTV APP	NEWTON NJ	BPCT-980126KH	63(o) I	5000 DA 348	41-00-43 74-35-32	225.7	75.64 -44.26	119.9 SHORT
WMBCTV LIC	NEWTON NJ	BLCT-940913KE	63(o) I	2190 223	41-00-36 74-35-39	225.7	75.91 -43.99	119.9 SHORT

** End of TV Separation Study for Channel 48 **

TV ->DTV Separation Study

Job Title :WRNN Ch. 48 - Beacon Mountain Site Separation Buffer 100 km
Zone : 1 FCC DTV DB Date: 03/16/98
Channel 48 (674-680 MHz) Coordinates : 41-29-19 73-56-52

Call Status	City St	FCC File No.	Channel Zone	ERP(kW) HAAT(m)	Latitude Longitude	Bear. True	Dist. (km)	Req. (km)
DWPIX	NEW YORK		33	116.80	40-42-43	183.7	86.43	24.1/80.5
DTVALT	NY		I	506.	74-00-49		5.93	CLOSE
DWFSB	HARTFORD		33	1000.0	41-46-30	71.1	100.35	24.1/80.5
DTVALT	CT		I	276.	72-48-20		19.85	CLEAR
DWMHT	SCHENECTADY		34	156.40	42-38-13	358.0	127.63	24.1/80.5
DTVALT	NY		I	299.	74-00-06		47.13	CLEAR
DWTWS	NEW LONDON		34	116.70	41-25-05	92.5	146.37	24.1/80.5
DTVALT	CT		I	381.	72-11-55		65.87	CLEAR
DWXTV	PATERSON		40	69.10	40-44-54	182.2	82.27	24.1/80.5
DTVALT	NJ		I	421.	73-59-10		1.77	CLOSE
DWNYW	NEW YORK		44	224.80	40-42-43	183.7	86.43	24.1/80.5
DTVALT	NY		I	515.	74-00-49		5.93	CLOSE
DWABCTV	NEW YORK		45	164.30	40-42-43	183.7	86.43	24.1/80.5
DTVALT	NY		I	491.	74-00-49		5.93	CLOSE
DWEDN	NORWICH		45	50.00	41-31-11	88.1	148.66	24.1/80.5
DTVALT	CT		I	207.	72-10-04		68.16	CLEAR
DWHCTTV	HARTFORD		46	219.50	41-46-30	71.1	100.71	24.1/80.5
DTVALT	CT		I	299.	72-48-04		20.21	CLEAR
DWFMZTV	ALLENTOWN		46	50.00	40-33-54	231.1	162.12	24.1/80.5
DTVALT	PA		I	313.	75-26-26		81.62	CLEAR
DWYDN	WORCESTER		47	101.00	42-08-32	62.5	160.55	12.0/106.0
DTVALT	MA		I	398.	72-13-28		54.55	CLEAR
DWNEPTV	SCRANTON		49	73.50	41-10-58	258.7	164.66	12.0/106.0
DTVALT	PA		I	506.	75-52-21		58.66	CLEAR
DWODD	AMSTERDAM		50	136.80	42-59-05	353.5	167.29	24.1/80.5
DTVALT	NY		I	223.	74-10-49		86.79	CLEAR
DWNJN	MONTCLAIR		51	179.20	40-51-53	197.1	72.47	24.1/80.5
DTVALT	NJ		I	243.	74-12-03		-8.03	SHORT
DWEDW	BRIDGEPORT		52	50.00	41-16-43	109.9	67.89	24.1/80.5
DTVALT	CT		I	222.	73-11-08		-12.61	SHORT
DWCBSTV	NEW YORK		56	364.60	40-42-43	183.7	86.43	24.1/80.5
DTVALT	NY		I	482.	74-00-49		5.93	CLOSE

** End of DTV Separation Study for Channel 48 **